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February 25, 2020

District Judge Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: 1:19-cv-09453-LTS-JLC
Smith v. Moran Foods, LLC

Dear District Judge Swain:

This office, with co-counsel Michael Reese, Reese LLP, represents the plaintiff. In accordance with your Honor's Individual Practices, plaintiff and defendant request an extension of sixty (60) days for defendant to file an answer or respond to the complaint.

The original date by which defendant is required to answer or respond is Tuesday, March 3, 2020. There have been no previous requests for an extension of this date. No previous request was granted or denied. Defendant consents to and joins plaintiff in the present request.

The reason for the request is to provide the parties additional time to consider how to proceed, such as a motion to dismiss or answer by defendant, an amended complaint by plaintiff or a resolution of the issues based on good faith discussions. This request is submitted at least 48 hours prior to the original compliance date. This request does not affect any other scheduled dates. Thank you.

Respectfully submitted,

/s/Spencer Sheehan
Spencer Sheehan

Certificate of Service

I certify that on February 25, 2020, I served and/or transmitted the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email	Fax
Defendant's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plaintiff's Counsel	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Courtesy Copy to Court	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

/s/ Spencer Sheehan